

10 FAM 570

GUIDELINES FOR MONITORING GENERAL GRANTS AND COOPERATIVE AGREEMENTS

(TL:PEC-01; 10-01-1999)

The purpose of this section is to improve the quality of grant and cooperative agreement monitoring in the Bureau of Educational and Cultural Affairs through the establishment of standards for monitoring. These standards provide a common framework for all offices to follow and represent minimum expectations. Staff are encouraged to exceed these standards whenever possible.

10 FAM 571 GENERAL POLICY

(TL:PEC-01; 10-01-1999)

It is the policy of the Bureau of Educational and Cultural Affairs to monitor the status and progress of grants and cooperative agreements and to provide reasonable assurance that (1) federal funds are expended in ways that meet the provisions of pertinent statutes, regulations, and administrative requirements, and (2) adequate progress is being made toward accomplishing the purpose of the grant or cooperative agreement.

10 FAM 572 APPLICABILITY

(TL:PEC-01; 10-01-1999)

All offices which administer grants for the Bureau are subject to the terms of these guidelines. Exemption from any provision may be requested with justifications by the cognizant Division Chief and must be approved by the cognizant Office Director.

10 FAM 573 ACTIVITIES

10 FAM 573.1 Monitoring

(TL:PEC-01; 10-01-1999)

Monitoring is the observation of, analysis of, or assistance to a grant or cooperative agreement organization to determine and improve:

- (1) Compliance with statutes, regulations, and terms and conditions of award; and

(2) Quality and the accomplishment of stated goals and objectives of the grant.

A monitoring plan should be developed by each Office Director which delineates how in a given fiscal year grants are to be monitored in accordance with the requirements set forth in this directive.

10 FAM 573.2 Authorization

(TL:PEC-01; 10-01-1999)

Activities must be consistent with and authorized by the Mutual Educational and Cultural Exchange Act, as amended, and must comply with the Bureau of Educational and Cultural Affairs' legislative charter. Grant and cooperative agreement instruments must comply with require with the requirements of the contracting officer, who is the sole official authorized to obligate the United States government in financial assistance awards.

10 FAM 573.3 Roles and Responsibilities

10 FAM 573.3-1 Office Directors

(TL:PEC-01; 10-01-1999)

Office directors are responsible to:

(1) Set guidelines for review and approve grant and cooperative agreement monitoring guidelines.

(2) Assure that monitoring functions are included in individual performance agreements, as appropriate.

(3) Identify resources to be used for monitoring

(4) Delineate monitoring responsibilities of managers and supervisors within the organization.

10 FAM 573.3-2 Managers, Program Officers

(TL:PEC-01; 10-01-1999)

(1) Develop grant and cooperative agreement monitoring plans.

(2) Develop appropriate and systematic monitoring approaches, guidelines, and instruments.

(3) Monitor grants and cooperative agreements in accordance with approved monitoring plans and procedures, with assistance from the grants administration office on business and financial management matters.

(4) Advise grants officers and grantees on programmatic aspects of grants.

(5) Resolve problems or participate in the resolution of problems relating to grants.

(6) Establish internal procedures for tracking follow-up actions resulting from monitoring.

(7) Review all relevant reports (including acknowledgments to grantees and recommendations to the grants administration office).

(8) Review pertinent audit reports for monitoring implications in conjunction with the audit staff.

(9) Share documents and information with grants officers.

10 FAM 573.3-3 Grants Division Staff

(TL:PEC-01; 10-01-1999)

(1) Assist in developing business management aspects of monitoring plans and monitoring guidelines.

(2) Establish internal procedures for tracking follow-up actions resulting from monitoring.

(3) Maintain official grant files.

(4) Approve changes in negotiated scopes of work or budgets.

(5) Monitor financial or business management aspects of grants.

(6) Review and approve grantee fiscal reports.

(7) Close out grants (with program and finance offices).

(8) Review pertinent audit reports for monitoring implications.

(9) Share documents and information with project officers.

10 FAM 573.3-4 Inspector General

(TL:PEC-01; 10-01-1999)

(1) Assure appropriate handling and resolution of allegations of fraud, waste, and mismanagement disclosed through monitoring.

(2) Inform offices of audit schedules and findings to assist program offices and grants offices in developing annual monitoring plans.

10 FAM 573.3-5 Office of Legal Adviser

(TL:PEC-01; 10-01-1999)

(1) Provide assistance to offices, as necessary, concerning legal issues raised in grant monitoring guidelines, monitoring instruments, monitoring contacts, and monitoring findings.

(2) Review for legal sufficiency and compliance with statutorily required procedures, grant guidelines and instruments that may interpret or apply statutes and regulations.

10 FAM 574 PURPOSE OF MONITORING

(TL:PEC-01; 10-01-1999)

a. The purpose of grant/cooperative agreement monitoring is to determine and improve compliance with statutes, regulations, and grant award terms and conditions; and project quality and progress in meeting its stated goals in accordance with the terms and conditions of the grant award.

b. More specifically, sufficient and systematic monitoring of grants is needed to make the following administrative determinations:

(1) Compliance of grantees with award conditions, grant regulations, and the authorizing legislation;

(2) Sufficient progress toward accomplishing stipulated and approved program goals;

(3) Relative quality and cost effectiveness of the management of projects and programs;

(4) Need for technical assistance to enhance project quality and compliance; and

(5) Identification and dissemination of exemplary results.

10 FAM 575 TIMING/PLANNING OF MONITORING

10 FAM 575.1 Application Period

(TL:PEC-01; 10-01-1999)

The period for monitoring spans the time from the first day to the last day of the grant/ cooperative agreement award

10 FAM 575.2 Monitoring Plan

(TL:PEC-01; 10-01-1999)

Each program office is responsible for developing a plan for monitoring grants/ cooperative agreements. The plan is designed to ensure that each program office develops monitoring activities that are consistent with statutory requirements and purposes. It must contain the following elements:

(1) A summary of the monitoring activities to be carried out based on anticipated resources. This summary should include an explanation of how monitoring priorities and methods were determined and an assurance that appropriate, available data on grants have been considered in formulating the plan (e.g., audit findings). The summary should provide information on the frequency, quantity, and purposes of monitoring methods being used.

(2) A report of the progress made.

(3) An analysis of any particular problems or opportunities that will require special attention and a description of relevant monitoring and assistance activities.

(4) An explanation of anticipated monitoring costs, including travel, equipment, and staffing.

(5) A copy of any grant guidelines and instruments being used in the monitoring process.

10 FAM 576 MONITORING APPROACHES AND ACTIVITIES

(TL:PEC-01; 10-01-1999)

All program offices should establish and maintain monitoring activities that are consistent with the statutory requirements and purposes of the authorizing legislation and the office's specific purposes. These activities must include, at a minimum, systematic and appropriate contact with grantees, clearly understood operational guidelines and procedures for Bureau staff, and, when appropriate, other activities that enhance the effectiveness of grantees' progress in meeting program goals.

10 FAM 576.1 Methods

(TL:PEC-01; 10-01-1999)

a. At least five methods can be used for monitoring:

(1) Telephone conversations

- (2) Site visits
- (3) Review of reports
- (4) Meetings with grantees
- (5) Correspondence (written or electronic)

b. Any substantive findings should be documented, followed up as necessary, and data made available for Department use, as appropriate.

10 FAM 576.2 Criteria

(TL:PEC-01; 10-01-1999)

Offices should monitor grants to the maximum extent possible within existing resources. At a minimum, all grantees must be monitored by telephone and review of reports each year. Complex or vulnerable grants, or projects with special significance, however, will require additional monitoring attention. Specific instructions related to these monitoring methods are outlined below.

10 FAM 576.2-1 Telephone Conversations

(TL:PEC-01; 10-01-1999)

Each program officer should use telephone monitoring in accordance with the approved annual monitoring plan. A log or other means should be used for internal tracking of the monitoring schedule. Guidelines or instruments should be used to ensure adequate coverage of topics. Exclusive use of telephone monitoring may be appropriate for renewal projects or for projects that cannot readily be visited, or when resources for other forms of monitoring are limited.

10 FAM 576.2-2 Site Visits

(TL:PEC-01; 10-01-1999)

Site visits, where funds permit, may be particularly appropriate for complex or troublesome projects or projects with special significance. Site visiting, however, should not be used as a substitute for other ongoing forms of monitoring. Each program monitoring manual should include guidelines for planning and conducting site visits, and for preparing follow-up reports. Prior to the visit, the project officer and grants officer should discuss both the financial and programmatic concerns related to projects to be visited.

10 FAM 576.2-3 Review of Reports

(TL:PEC-01; 10-01-1999)

To ensure the timely review of reports, each program office and grants office should use or establish procedures for tracking deadlines for submission, dates of review, and follow-up actions.

(1) The Grants Division should send all grantee performance and evaluation reports to the program office within five days of receipt. The program office must review reports within 15 calendar days of receipt for any necessary follow-up action. A copy of the project officer's evaluation of the report should be sent to the Grants Division.

(2) Each financial status report must be reviewed by the responsible grants officer within 30 calendar days of receipt. Any action necessary as a result of such a review should be initiated within 5 work days of the review.

(3) Written notice of unacceptable reports must be provided to grantees within ten work days of review. Grantees must be given specific guidance and a deadline for submitting either a revised report or the additional information needed.

(4) Meetings where a number of grantees are in attendance, or meetings specifically for project directors/staff, provide an opportunity for monitoring. At these events, for example, Bureau staff members can make their monitoring expectations clear to grantees, gather information on project needs and progress, and hold networking sessions where grantees and other experts assist one another in better meeting program goals.

(5) Correspondence may be used to obtain information, resolve problems, or to communicate program developments and goals.

10 FAM 576.2-4 Follow-up Procedures

(TL:PEC-01; 10-01-1999)

(1) All monitoring contacts should be documented. Significant findings (e.g., items requiring official action, problems requiring resolution, site visit reports) must be documented in a form or report that, at a minimum, identifies the project, person contacted, method of monitoring, and summarizes the findings, recommendations, and proposed follow-up actions, including deadlines and assignment of responsibilities.

(2) The documentation form or report should be placed in the program office grant file. When a Bureau monitoring data system is established, the documentation should also be entered into the system according to the guidelines provided.

(3) All follow-up actions that cannot be resolved by the program office should be referred to the appropriate office for resolution. For example, if the program officer has been responsible for conducting the monitoring, any financial problems and issues of compliance requiring official action should be referred to the Grants Division or other offices, as appropriate. Requests for action must be made as soon as possible after making a determination of needed action. The program monitoring guidelines should explain procedures for referring and documenting such requests within Department offices.

(4) Each program and grants administration office, as appropriate, should establish procedures for tracking any follow-up actions pursuant to monitoring. Periodic checks should be made to ensure follow-up action is occurring on schedule.

10 FAM 577 THROUGH 579 UNASSIGNED